

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
SHAW FAMILY ARCHIVES, LTD.,
BRADFORD LICENSING, INC., JAMES E.
DOUGHERTY, and VALHALLA
PRODUCTIONS, LLC.

Plaintiffs/Consolidated Defendants,

v.

CMG WORLDWIDE, INC. and MARILYN
MONROE, LLC,

Defendants/Consolidated Plaintiffs.
----- X

05 CV 3939 (CM)

Honorable Colleen McMahon

FILED
U.S. DISTRICT COURT
2006 JUL 18 PM 12:44
S.D. OF N.Y. W.P.


NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

PLEASE TAKE NOTICE that, upon the Declaration of Michelle M. Craven submitted herewith, Defendant/Consolidated Plaintiff, MARILYN MONROE, LLC ("MML"), moves this Court, unopposed, on a date to be determined by this Court, at the United States Courthouse, 300 Quarropas Street, White Plains, NY 10601, for an Order pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, admitting Tracy N. Betz Pro Hac Vice.

Plaintiffs/Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

Dated: New York, New York
June 29, 2006

GIBSON, DUNN & CRUTCHER LLP

By: 
Michelle M. Craven (MC-8556)
200 Park Avenue, 47th Floor
New York, New York 10166
(212) 351-4000

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SHAW FAMILY ARCHIVES, LTD.,	:	
BRADFORD LICENSING, INC., JAMES E.	:	
DOUGHERTY, and VALHALLA	:	
PRODUCTIONS, LLC.	:	
	:	
Plaintiffs/Consolidated Defendants,	:	05 CV 3939 (CM)
	:	
v.	:	
	:	
CMG WORLDWIDE, INC. and MARILYN	:	Honorable Colleen McMahon
MONROE, LLC,	:	
	:	
Defendants/Consolidated Plaintiffs.	:	
-----	X	

DECLARATION OF PERSON MOVING ADMISSION

Michelle M. Craven, being duly sworn, says:

1. I am an associate of the firm of Gibson, Dunn & Crutcher LLP, counsel for Defendant/Consolidated Plaintiff, MARILYN MONROE, LLC ("MML") in the above-captioned action. I have been a member of the bar of this Court since December 2, 2003. I make this declaration in support of Defendant/Consolidated Plaintiff's motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for the admission of Tracy N. Betz to the bar of this Court Pro Hac Vice.

2. Tracy N. Betz is an associate of the firm Sommer Barnard PC, counsel for Defendants/Consolidated Plaintiffs CMG and MML in this action. Ms. Betz is a member in good standing of the bar of the State of Indiana. (See Certificate issued by the Supreme Court of the State of Indiana, dated June 30, 2006, attached hereto). Ms. Betz is familiar with the Federal Rules of Civil Procedure and has familiarized herself with the Rules of this Court.

3. Plaintiffs/Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

4. Accordingly, I respectfully request that Ms. Betz be admitted to the bar of this Court Pro Hac Vice.

Dated: New York, New York
June 21, 2006

By: 

Michelle M. Craven (MC-8556)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue, 47th Floor
New York, New York 10166
(212) 351-4000

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SHAW FAMILY ARCHIVES, LTD.,	:	
BRADFORD LICENSING, INC., JAMES E.	:	
DOUGHERTY, and VALHALLA	:	
PRODUCTIONS, LLC.	:	
	:	
Plaintiffs/Consolidated Defendants,	:	05 CV 3939 (CM)
	:	
v.	:	
	:	
CMG WORLDWIDE, INC. and MARILYN	:	Honorable Colleen McMahon
MONROE, LLC,	:	
	:	
Defendants/Consolidated Plaintiffs.	:	
	:	
-----	X	

DECLARATION OF PARTY SEEKING ADMISSION

Tracy N. Betz, being duly sworn, says:

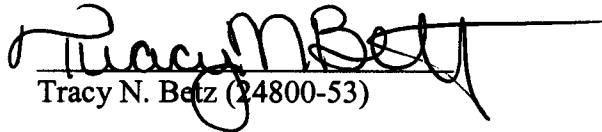
1. I am an associate of the firm of Sommer Barnard PC, counsel for Defendants/Consolidated Plaintiffs CMG Worldwide, Inc. ("CMG") and Marilyn Monroe, LLC ("MML") in the above-captioned action.
2. I make this Declaration in connection with the Declaration of Michelle M. Craven, dated June 29, 2006, in support of my admission Pro Hac Vice to the bar of this Court for the purpose of representing Defendants/Consolidated Plaintiffs CMG and MML in this matter.
3. Plaintiffs/Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.
4. I have been duly admitted to practice law in the State of Indiana since October 18, 2004 and I am a member in good standing of bar of the Indiana State Bar (See Certificate issued by the Supreme Court of the State of Indiana, dated June 30, 2006, attached hereto).

5. I am familiar with the facts of this case, and it would be in Defendants/Consolidated Plaintiffs CMG's and MML's interest for me to be permitted to appear and to participate in these proceedings.

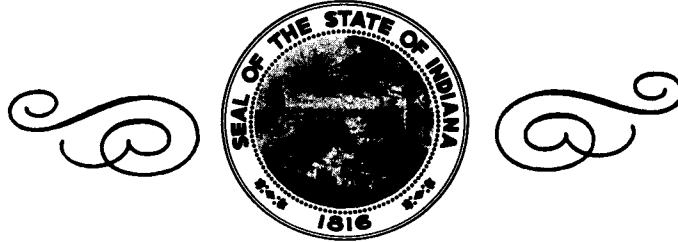
6. I am familiar with the Federal Rules of Civil Procedure, and I have familiarized myself with the rules of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Indianapolis, Indiana
June 30, 2006


Tracy N. Betz (24800-53)

SUPREME COURT OF THE STATE OF INDIANA



Certification

STATE OF INDIANA, SS:

I, Kevin S. Smith, Clerk of the Supreme Court
of Indiana, do hereby certify that

TRACY NICOLE BETZ-SANDIFUR

is a member of the bar of said Court since admission on
OCTOBER 18th 2004, and is in good
standing therein.

GIVEN under my hand and the seal of said Court at Indianapolis,
Indiana, this 30th day of JUNE, 20 06.

KEVIN S. SMITH
CLERK, SUPREME COURT OF INDIANA